

Zachary M. Best, SBN 166035
MISSION LAW FIRM, A.P.C.
332 North Second Street
San Jose, California 95112
Telephone (408) 298-2000
Facsimile (408) 298-6046
E-mail: service@mission.legal

Attorney for Plaintiff,
Francisca Moralez

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

FRANCISCA MORALEZ,

Plaintiff,

VS.

WOMAR, INCORPORATED dba CARL'S
JR.; CENTURY PLAZA CORPORATION;

Defendants.

No. . 4:17-cv-05128-KAW

**STIPULATION TO EXTEND DEADLINE
TO COMPLETE JOINT SITE
INSPECTION REQUIRED BY GENERAL
ORDER 56; ~~PROPOSED~~ ORDER**

STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION REQUIRED BY
GENERAL ORDER 56; [PROPOSED] ORDER

1 Plaintiff, Francisca Moralez ("Plaintiff"), and Defendants, Womar, Incorporated dba
2 Carl's Jr., and Century Plaza Corporation ("Defendants," and together with Plaintiff, "the
3 Parties"), by and through their respective counsel, hereby stipulate as follows:

4 1. This action arises out of Plaintiff's claims that Defendants denied her full and
5 equal access to their public accommodation on account of her disabilities in violation of Title
6 III of the Americans with Disabilities Act ("ADA") and parallel California law. Plaintiff seeks
7 injunctive relief under federal and California law, as well as damages under California law.
8 This matter therefore proceeds under this district's General Order 56 which governs ADA
9 access matters.

10 2. The Court has ordered that the Parties conduct a joint site inspection of the
11 subject property on or before December 15, 2017 (Dkt. 4).

12 3. The Parties are engaging in settlement discussions and wish to avoid incurring
13 additional attorney's fees and costs incident to attending the joint site inspection while
14 settlement efforts are being exhausted.

15 4. The Parties have agreed to conduct the joint site inspection on January 29, 2018
16 at 10:30 a.m. unless a settlement is reached prior to that date.

17 5. Accordingly, the Parties stipulate to extend the deadline to conduct the joint site
18 inspection to January 29, 2018.

19
20 **IT IS SO STIPULATED.**

21
22 Dated: December 13, 2017

MISSION LAW FIRM, A.P.C.

23
24 /s/ Zachary M. Best

Zachary M. Best

Attorney for Plaintiff,

Francisca Moralez

25
26 ///

27 ///

28

STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION REQUIRED BY
GENERAL ORDER 56; [PROPOSED] ORDER

1 Dated: December 13, 2017

LAW OFFICE OF MICHELLE LEU ZACCONE

2
3 /s/ Michelle Leu Zaccoone

Michelle Leu Zaccone

4 Attorneys for Defendants

5 Womar, Incorporated dba Carl's Jr. and

6 Century Plaza Corporation

7 **ATTESTATION**

8 Concurrence in the filing of this document has been obtained from each of the individual(s)
9 whose electronic signature is attributed above.

10 /s/ Zachary M. Best

Zachary M. Best

11 Attorney for Plaintiff,

12 Francisca Moralez

13
14 **ORDER**

15 The Parties having so stipulated and good cause appearing,

16 **IT IS HEREBY ORDERED** that the deadline for the Parties to complete the joint site
17 inspection is extended to January 29, 2018, with all dates triggered by that deadline continued
18 accordingly.

19
20 **IT IS SO ORDERED.**

21
22 Dated: 12/15/17



United States Magistrate Judge

23
24
25
26
27
28

STIPULATION TO EXTEND DEADLINE TO COMPLETE JOINT SITE INSPECTION REQUIRED BY
GENERAL ORDER 56; [PROPOSED] ORDER